

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

SPACE EXPLORATION
TECHNOLOGIES CORP.,

Plaintiff,

v.

NATIONAL LABOR RELATIONS
BOARD, a federal administrative agency,
JENNIFER ABRUZZO, in her official
capacity as the General Counsel of the
National Labor Relations Board, LAUREN
M. McFERRAN, in her official capacity as
the Chairman of the National Labor
Relations Board, MARVIN E. KAPLAN,
GWYNNE A. WILCOX, and DAVID M.
PROUTY, in their official capacities as
Board Members of the National Labor
Relations Board, and JOHN DOE in his
official capacity as an Administrative Law
Judge of the National Labor Relations
Board,

Defendants.

Case No. 1:24-cv-00001

**DECLARATION OF DEBORAH LAWRENCE IN SUPPORT OF MOTION TO
INTERVENE**

I, Deborah Lawrence, declare as follows:

1. I have personal knowledge of the facts herein and, if called upon to testify to those facts, I could and would do so competently.
2. I was employed by Space Exploration Technologies Corp. (“SpaceX”) beginning in 2018 as a Firmware Engineer.
3. During the course of my employment with SpaceX I lived in Seattle Washington and was assigned to the Redmond, Washington facility. However, at times I reported to managers in Hawthorne, California.
4. On or about December 14, 2021 I became aware of published accounts by several former employees of having been sexually harassed at SpaceX, and then having been retaliated against by HR for reporting it. I found these accounts very disconcerting.
5. Separately, on or about May 19, 2022 I learned that SpaceX’s CEO Elon Musk was accused of sexually harassing a SpaceX flight attendant and that in response, he publicly ridiculed the alleged victim. In response to Musk’s denial and ridicule of the alleged victim, SpaceX’s President, Gwynne Shotwell, publicly supported Musk by sending an email to the company claiming that the allegations against him were not true.
6. In addition to these specific issues arising from the allegations concerning Musk’s alleged sexual harassment, I, as a SpaceX employee, was continually bombarded with social media posts by CEO Elon Musk degrading women and the LGBTQ community that featured inappropriate sexual comments and jokes. These posts were actively circulated in the workplace, with many actually posted on internal SpaceX platforms, making it impossible for employees to avoid Musk’s degrading and demeaning comments. Indeed, important information about our substantive work was often mixed into Musk’s Tweets, so we could not afford to ignore them.

7. Neither SpaceX management nor its Human Relations department took corrective action to remediate the hostile work environment that was created by Musk.

8. In order to try to effectuate change in the workplace, in late May 2022, I began discussing with other colleagues mechanisms for getting management to take action. I did not attend in-person meetings regarding what course of action to take but did communicate with the other employees in the Hawthorne location who had primary responsibility for drafting the Open Letter to SpaceX's executive team and made some suggested edits to the letter.

9. The "Open Letter" issued from California on June 15, 2022.

10. On or about June 16, 2022, SpaceX terminated the employment of several of my colleagues who participated in writing the "Open Letter." I received an email from Gwynne Shotwell indicating that these employees were terminated for their involvement in creating this letter.

11. On July 18, 2022 I received an email from Lindsay Chapman (HR) advising that I needed to meet with her in person on July 20, 2022. During that meeting Chapman aggressively questioned me about my role in drafting and/or circulating the "Open Letter." At the close of the day I was placed on administrative leave and on July 22, 2022 Chapman advised me that my employment was being terminated effective August 1, 2022.

12. After my termination I, along with other seven other colleagues who were terminated over the same issue (participating in the Open Letter) retained counsel (Anne Shaver of Lieff, Cabraser Heimann & Bernstein, LLP and Laurie Burgess of Burgess Law Offices, P.C.) to file charges under the NLRB on our behalf.

13. Our counsel filed charges of unfair labor practices with the NLRB Region 31 in Los Angeles on November 16, 2022.

14. I spent significant time providing evidence of SpaceX's misconduct to NLRB agents in Region 31 in Los Angeles, California. Thereafter my counsel filed amended charges and on January 3, 2024 Region 31 issued a complaint with a hearing set for March 5, 2024 in Los Angeles, California.

15. My lawyers advised me that SpaceX filed a Complaint in Texas on January 4, 2024. I have reviewed that Complaint.

16. I was made to sign a mandatory employment document, the "confidentiality agreement" which states that "[t]he validity, interpretation, construction and performance of this Agreement shall be governed by the laws of the State of California, without giving effect to the principles of conflict of laws."

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on the 8th of January, 2024 in Berlin, Germany.

/s/ Deborah Lawrence